

EXHIBIT D

13 HIGHLY CONFIDENTIAL
14 SUBJECT TO FURTHER CONFIDENTIALITY REVIEW

16 VIDEOTAPED DEPOSITION OF
17 DEBORAH BISH

19 February 1, 2019

21 Toledo, Ohio

1 MR. GADDY: Objection to form.

2 BY THE WITNESS:

3 A. Not if they had the large quantities in
4 there that alerted us, they would have always been
5 checked.

6 BY MS. SWIFT:

7 Q. Do you have any personal knowledge of
8 Walgreens ever shipping controlled substances into any
9 illegitimate channels?

10 MR. GADDY: Objection to form.

11 BY THE WITNESS:

12 A. No.

13 BY MS. SWIFT:

14 Q. Do you have any personal knowledge of
15 Walgreens ever shipping controlled substances to a
16 Walgreens store that then diverted those controlled
17 substances into an illegitimate channel?

18 A. No.

19 Q. Did you personally take steps in your job
20 to make sure that Walgreens did not ship unusually
21 large quantities of controlled substances to Walgreens
22 stores?

23 MR. GADDY: Objection to form, leading.

24 BY THE WITNESS:

1 A. In addition to calling the store or you
2 are saying -- is that the point you are try -- asking?

3 BY MS. SWIFT:

4 Q. Let me see if I can ask it in a more
5 open-ended way.

6 A. Sorry.

7 Q. We've talked about a number of steps in
8 the ordering process where unusually large orders may
9 have been brought to your attention.

10 A. Right.

11 Q. In that process did you take steps to make
12 sure that Walgreens wasn't shipping unusually large
13 quantities of controlled substances to the stores?

14 MR. GADDY: Objection to -- objection to form,
15 leading.

16 BY THE WITNESS:

17 A. Yes, I would call the store and usually
18 mark the order down because they didn't really want
19 what they ordered, if it was an unusually large
20 amount.

21 BY MS. SWIFT:

22 Q. If you would, please, pull out of your
23 stack of exhibits Exhibit 14.

24 A. Okay.

1 Q. Exhibit 14 is the memorandum from
2 Mr. Todd -- I'm sorry -- it is from Justin Joseph to
3 Todd Polarolo dated May 27th, 2006, with the "re"
4 line: "DEA audit preliminary response March 6th,
5 2006."

6 Correct?

7 A. Yes.

8 Q. Do you remember getting questions about
9 this memorandum earlier today?

10 A. Yes.

11 Q. I believe you testified you had never seen
12 it before, correct?

13 A. Correct.

14 Q. Okay. I just have a couple of questions
15 about it.

16 Just to refresh your memory a little bit,
17 counsel asked you questions about the third paragraph
18 in the memo regarding the regulation with
19 No. 1301.74 (b).

20 Do you see that?

21 A. Yes.

22 Q. Do you remember those questions?

23 A. I don't remember the questions, no.

24 Q. Do you remember the questions about the